

KRONENBERGER BURGOYNE, LLP

Karl S. Kronenberger (Cal. Bar No. 226112)

Deepa Krishnan (Cal. Bar No. 228664)

150 Post Street, Suite 520

San Francisco, CA 94108

Telephone: (415) 955-1155

Facsimile: (415) 955-1158

karl@kronenbergerlaw.com

deepa@kronenbergerlaw.com

Attorneys for Plaintiff

Quick Learning, LLC

a Texas Limited Liability Company

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Quick Learning, LLC, a Texas Limited
Liability Company,

Plaintiff,

vs.

QUICKLEARNING.COM, an Internet
domain name,

Defendant.

Case No. C-07-06456-MHP

**DECLARATION OF SERGIO ZUNIGA
IN SUPPORT OF SUPPLEMENTAL
BRIEFING IN RESPONSE TO
COURT'S ORDER OF APRIL 30,
2008 REGARDING APPLICATION
FOR DEFAULT JUDGMENT**

KRONENBERGER BURGOYNE, LLP
150 Post Street, Suite 520
San Francisco, CA 94108
www.kronenbergerlaw.com

DECLARATION OF SERGIO ZUNIGA

I, SERGIO ZUNIGA, declare as follows:

1. I am the managing member of Plaintiff Quick Learning, LLC ("Quick Learning") in this action. Except as otherwise noted, I have personal knowledge of the facts stated herein and could and would competently testify thereto.

2. The owners of the Quick Learning business founded their company in 1984 in Mexico, and, upon expanding business operations to the United States, founded Quick Learning in the United States in 1999 as a limited liability company organized under the laws of the state of Texas. Quick Learning is a global innovator in language training and provides language training courses throughout the United States and internationally. Quick Learning offers its language immersion classes at over 48 locations in the United States and internationally. Quick Learning has training facilities in Dallas, Irving, Avington and Houston, Texas, in Phoenix, Arizona and in Las Vegas Nevada, and it will be opening a training facility in Los Angeles, California in August 2008. Quick Learning also has training facilities in all major cities in Mexico. Each month over 20,000 students use Quick Learning's innovative language training methods.

3. Quick Learning has provided its services under the trademark, "Quick Learning," since its inception in the U.S. in 1999, in the form of signage at its 8 locations in the U.S. (40+ of its locations are in Mexico), use in magazine and newspaper marketing in the U.S., use in radio advertising in the U.S., and many other uses in the ordinary course of business in the U.S. Such use in the U.S. has been continuous and exclusive since 1999. Since its inception, Quick Learning has spent millions in marketing in the U.S. under its trademark and has generated millions in revenues in the U.S. Over the past two years alone, Quick Learning has spent over \$700,000 per year in marketing in the U.S. under its trademark and has generated over \$4.5 million per year in revenue in the U.S. under its trademark. "Quick Learning" is a widely recognized trademark and is associated with high quality language immersion training in the United States.

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2 I declare under penalty of perjury under the laws of the United States of America
3 that the foregoing is true and correct and that this Declaration was executed on May 29,
4 2008, in Dallas, Texas.

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Sergio Zuniga